

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DONNA CURLING, et al.,)
)
Plaintiffs,)
) CIVIL ACTION FILE
vs.)
) NO. 1:17-cv-2989-AT
BRAD RAFFENSPERGER, et al.,)
)
Defendants.)

The remote videoconference deposition of WILLIAM
EDWARD DIGGES, III, taken pursuant to the
stipulations contained herein; the reading and
signing of the deposition reserved, before Charlene
M. Hansard, B-2341, Certified Court Reporter,
commencing at 10:06 a.m., on Thursday, September 23,
2021, with witness located in Marietta, Georgia
30066.

A P P E A R A N C E S

(All parties appeared remotely by Zoom
videoconference.)

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A P P E A R A N C E S
(continued)

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ALSO PRESENT:

Ms. Marilyn Marks, Executive Director
Coalition for Good Governance

Mr. Matthew Riesdorph, Veritext Concierge Tech

Legend of the Transcript:

(sic)	Exactly as said
(phonetic)	Exact spelling unknown
. . .	Trailing off or did not complete thought
--	Break in speech continuity
uh-huh	Affirmative
uh-uh	Negative

I N D E X

WITNESS PAGE

WILLIAM EDWARD DIGGES, III

Examination By Ms. Laross6

DEFENDANT'S EXHIBITS

EXHIBIT
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Exhibit 1 Notice of Deposition14

Exhibit 2 ENET report34

Exhibit 3 Coalition Plaintiffs' Statement on ...40
William Digges

Exhibit 4 Declaration of William Digges,58
III, dated October 20, 2019

Exhibit 5 Declaration of William Digges,58
III, dated September 27, 2018

Exhibit 6 Bullet point sheet68

(Originally marked exhibits attached to the
original of the deposition and a copy attached
to all copies produced.)

1 to go look and see if I have it. But I see it now.

2 Q. Okay. Great. And do you see in that first
3 paragraph where it notifies that there'll be an
4 examination -- oral examination under oath of Plaintiff
5 William Digges, III, on Thursday, September 23, 2021,
6 beginning at 10:00 a.m.? Do you see that --

7 A. Yes.

8 Q. -- on the exhibit? Okay. Mr. Digges, you
9 mentioned that you live in Cobb County. How long have
10 you lived in Cobb County?

11 MS. LAROSS: Matt, we don't need that
12 exhibit anymore.

13 BY MS. LAROSS:

14 Q. Excuse me, Mr. Digges. I'm sorry about that.
15 How long have you lived in Cobb County?

16 A. Since 1996.

17 Q. And just generally, where did you live before
18 moving to Cobb County in 1996?

19 A. Colorado.

20 Q. Are you originally from Colorado?

21 A. No, ma'am.

22 Q. Where are you originally from?

23 A. New Jersey.

24 Q. And in Georgia, have you lived in any other
25 counties other than Cobb County?

1 Q. In that case did you give any testimony?

2 A. No.

3 Q. I'm going to ask you a few questions about
4 your educational background. So how far did you get in
5 school in terms of high school or college?

6 A. College.

7 Q. And what degrees do you hold?

8 A. I have a bachelor's degree in accounting and
9 a master's degree in information systems.

10 Q. When did you obtain your bachelor's degree in
11 accounting?

12 A. I think it was --

13 Q. Are you looking at a certificate or diploma?

14 A. Yeah, I got it on the wall.

15 Q. Okay.

16 A. '80 -- I can't read that crazy writing. '82.

17 Q. Okay. And what school did you receive that
18 degree from?

19 A. Fairleigh Dickinson University.

20 Q. And your master's degree, when did you obtain
21 your master's degree?

22 A. 1995.

23 Q. And what school did you receive that degree
24 from?

25 A. Regis University, Colorado.

1 more for financial analysis and that kind of thing.

2 Q. And the classes in database analysis, were
3 those associated with your employment?

4 A. Yes.

5 Q. Have you had any formal education in election
6 law or voting --

7 A. No.

8 Q. -- law? So then it was correct that you
9 don't have any training in Georgia election law?

10 A. No.

11 Q. Have you had any training in election
12 administration or procedures in Georgia or any other
13 state?

14 A. No.

15 Q. Have you ever worked at a polling place
16 either as a poll worker or in any other role?

17 A. No.

18 Q. So you had mentioned that you've had classes
19 concerning databases. Describe for us what training
20 that you have or training or education you have related
21 to computers or hardware or programming.

22 A. Well, which of those?

23 Q. Okay. Well, then we'll take them one at a
24 time. That -- That's fair. Absolutely. Okay. So do
25 you have any training or education related to computer

1 hardware?

2 A. No training, no.

3 Q. Okay. Training or education concerning
4 computer programming?

5 A. Yes.

6 Q. And describe for us --

7 A. Excuse me.

8 Q. Go ahead. Excuse me.

9 A. I said very little. I mean, just general
10 programming classes.

11 Q. Okay. So what about training or education in
12 cybersecurity?

13 A. None.

14 Q. Training or education with respect to voting
15 equipment?

16 A. None.

17 Q. Do you have any training or education related
18 to computer hacking?

19 A. No.

20 Q. Do you have any training or education related
21 to the insertion of malware into a computer system or a
22 voting -- or voting machines?

23 A. No.

24 Q. Any training or education concerning the
25 operation or functioning of DREs which are direct

1 recording electronic voting machines?

2 A. No training, no.

3 Q. Any training or education concerning the
4 operation or functioning of ballot marketing devices
5 also known as BMDs?

6 A. No.

7 Q. Any training or education concerning the
8 operation or functioning of scanners used in
9 conjunction with ballot marking devices or BMDs?

10 A. No.

11 Q. And your answer was no. Okay.

12 A. True.

13 Q. Had you ever voted on a DRE or a direct
14 recording device?

15 A. Was that the older ones or the newer ones?

16 Q. Yes, that would be the older ones here in
17 Georgia --

18 A. Yes.

19 Q. -- correct. Have you ever voted on the newer
20 ones or the ballot marking devices also known as BMDs?

21 A. No.

22 Q. Do you have any writings or publications
23 related in any way to voting or elections?

24 A. Excuse me. I didn't quite --

25 Q. Sure. Do -- Let me ask it this way. So do

1 you have any writings or written any publications
2 related to voting or elections?

3 A. No.

4 Q. I'm going to ask you some questions about
5 your employment history, and we can speak about that
6 generally. I know you've mentioned that you worked for
7 IBM; is that correct?

8 A. Yes.

9 Q. And when did you work for IBM?

10 A. From 1977 to 2010.

11 Q. And, generally, what did you do for IBM
12 during that tenure?

13 A. Various roles, so mostly finance, systems
14 development, analysis of various companies I guess
15 within IBM, reporting accounting structure, building
16 accounting structures.

17 Q. Any employment after IBM?

18 A. Yes.

19 Q. And where did you work after leaving IBM?

20 A. Kennesaw State University.

21 Q. How long did you work for Kennesaw State?

22 A. Nine years and five months.

23 Q. Sorry. Did you say ten years and five
24 months?

25 A. Nine.

1 Q. Oh, sorry. Okay. It was nine years and five
2 months at Kennesaw State; correct?

3 A. (No audible response.)

4 Q. Okay. You'll need to say it verbally.

5 A. Yeah. Thought I did.

6 Q. Okay. And what did you do for Kennesaw State
7 University?

8 A. Mostly accounting, just general accounting
9 tasks.

10 Q. Any employment since Kennesaw State
11 University?

12 A. No.

13 Q. So fair to say that you retired after working
14 at Kennesaw State University?

15 A. Yes.

16 Q. Any other employment other than IBM and
17 Kennesaw State University, I guess, since, you know, in
18 the late '70s is when you started with IBM, did you
19 work for anyone else while you had either of those
20 positions?

21 A. No.

22 Q. And when you left IBM, was there a reason for
23 your departure?

24 A. I retired from IBM.

25 Q. So that was your choice to leave IBM;

1 correct?

2 A. No. That was -- No, I was eligible to
3 retire, and so they retired me.

4 Q. I see. Okay. And with Kennesaw State
5 University, was that -- did you -- was retirement your
6 choice or --

7 A. Yes.

8 Q. -- was that similar?

9 A. That was my choice.

10 Q. Have you done any voter advocacy work?

11 A. What is -- What would that be, I guess?

12 Q. Okay. Would -- Might be a membership in a
13 voting rights group or participated in any events for
14 voter groups that advocate for voting rights?

15 A. Yeah. I'm a member of the Coalition for Good
16 Governance. And I've been to a couple of events, maybe
17 more than two, but, yeah. Over the years, yeah.

18 Q. How long have you been a member of the
19 Coalition for Good Governance?

20 A. I want to say since late 2017.

21 Q. And you mentioned that you attended a couple
22 of events with the Coalition. Have you done any other
23 work with the Coalition?

24 A. Yeah. I went through some data for them,
25 just transcribing mostly. Went to a few of the state

1 meetings along with other members just, you know, to be
2 there and see what was going on.

3 Q. Did you hold any -- Were you an officer for
4 the organization or any other kind of leadership --

5 A. No, I have --

6 Q. -- kind of position?

7 A. -- no title.

8 Q. Are you a member of any other organization
9 that is related to elections or voting?

10 A. No.

11 Q. Have you ever been a member of any other
12 organization related to elections or voting --

13 A. No.

14 Q. -- other than the Coalition?

15 A. No.

16 Q. Okay. And what would you say in your own
17 words is the purpose of the Coalition for Good
18 Governance?

19 A. Well, I think they do a lot of things, so
20 they don't -- I look on them as a watchdog. You know,
21 they're paying attention to the voting, how it's done,
22 the rules that are created about voting. And then they
23 make commentaries, and they lobby and try to get things
24 put right to their point of view.

25 Q. Is there any particular work that's drawn you

1 Q. Mr. Digges, what is your purpose in
2 participating as a party in the lawsuit we're here
3 about today?

4 A. To get the voting moved to paper ballots --
5 hand-marked paper ballots.

6 Q. So it's your preference that here in Georgia
7 we would move to hand-marked paper ballots?

8 A. Yes.

9 Q. And what is your understanding of the claims
10 that are pending in this case?

11 A. Such as? Claims?

12 Q. The claims are what -- or the complaints that
13 are -- or the areas that you're challenging as part of
14 the lawsuit. We call them claims, but I understand
15 that you might not call it that. Does that make any
16 sense?

17 A. Well, areas?

18 Q. Okay. Yeah, areas would be fine. So what
19 areas would you understand to be what's raised in the
20 lawsuit on your behalf?

21 A. Well, I think basically that the machines are
22 insecure. I think they're -- they can be hacked. And,
23 therefore, they're not trustworthy. I don't -- I don't
24 like the privacy issues that come along with those
25 large screens. And then with the -- with the voting

1 record -- individual's voting record being translated
2 to a QR code is also -- concerns me.

3 Q. And what concerns you about that individual
4 voting record translating to a QR code?

5 A. Well, it's a -- it's a process where you're
6 taking something that's easily read and seen and
7 turning it into something that cannot be read and seen
8 by the individual voter. And the process that does
9 that is not visible nor do we know who's responsible
10 for it, who can change it, when is it changed. So I
11 see no controls over that transition, and that concerns
12 me greatly.

13 Q. And you mentioned earlier that you had voted
14 on the older machines here in Georgia which are the
15 DREs. Do you have any evidence that any votes that you
16 cast on a voting machine here in Georgia were not
17 counted?

18 A. No, I do not.

19 Q. Do you have any evidence that the votes you
20 cast on a voting machine here in Georgia were changed?

21 A. No, I do not.

22 Q. Do you have any evidence that any DRE or
23 voting machine of the old voting machines used in
24 Georgia has ever actually been hacked?

25 A. No. Other than a court demonstration, no.

1 A. No.

2 Q. Do you have any knowledge of any evidence
3 that malware was inserted into any Georgia voting
4 machine?

5 A. No.

6 Q. Do you have any evidence that the new voting
7 machines in Georgia, the BMDs, have been hacked?

8 A. No.

9 Q. And just to be clear, do you have any
10 evidence that there has been malware inserted into any
11 of the new voting machines or BMDs used in Georgia
12 elections?

13 A. No.

14 Q. I'm going to refer you to an exhibit. It'll
15 just take me a moment to upload it, and then I will ask
16 you to go ahead and refresh your screen. It's not
17 there yet. I'll let you know when it's there.

18 A. Uh-huh.

19 Q. Okay. It's been uploaded so everyone can
20 refresh their screens, and they should find Exhibit No.
21 2 in the marked exhibit folder.

22 A. Okay.

23 (Exhibit No. 2, ENET report, was marked for
24 identification purposes.)

25 THE CONCIERGE TECH: And Ms. LaRoss, this

1 Q. Okay. All right. Have you ever voted in any
2 other state other than Georgia?

3 A. Oh, yeah. Every state I have lived in, I
4 have voted.

5 Q. Okay. So that would -- List for me the
6 states you voted in.

7 A. New Jersey, New York, Colorado, and Georgia.

8 Q. Okay. So if we could go back to Exhibit WD
9 0002 and look at the bottom half of the first page.

10 A. Yeah.

11 Q. Okay. And then if you will look in the
12 column, ballot type.

13 A. Right, regular, regular, up to the '16,
14 right, or '14?

15 Q. 2016.

16 A. Yeah.

17 Q. Yeah. So would that be an accurate time
18 between the November 1996 up through November 2014 when
19 you cast regular ballots on a voting machine?

20 A. Yes, that's about right.

21 Q. Okay. And then if you look at the next entry
22 on November 2016 in the general election --

23 A. Uh-huh.

24 Q. -- it's noted under the ballot type,
25 absentee; correct?

1 A. Correct.

2 Q. And since that time, you've voted only
3 absentee here in Georgia; correct?

4 A. Yes.

5 Q. And why did you change from casting a regular
6 ballot on a voting machine to casting your ballot by
7 absentee?

8 A. I wanted to ensure that my vote was getting
9 counted, and I wanted to have a auditable paper record
10 of my vote.

11 Q. Do you have -- Did you -- Do you have copies
12 of the ballots that you've cast?

13 A. Somewhere.

14 Q. Sorry. I didn't hear your answer, sir.

15 A. I don't know if I have them from that far
16 ago, no.

17 Q. Do you have them more -- from the more recent
18 years and the more recent elections you have
19 participated in?

20 A. I don't recall. I'd have to go dig through
21 all the papers.

22 Q. And you'd mentioned earlier that you've never
23 voted on the new voting machines in Georgia; correct?

24 A. Yes, that -- Yes, that is correct.

25 Q. Okay. Do you have any plans to vote on a

1 voting machine here in Georgia in the future?

2 A. No.

3 Q. If you could look back on Exhibit WD 0002 --

4 A. Uh-huh.

5 Q. -- and, again, the same section we were
6 looking at, if you could look across the columns to
7 counted comments. Do you see that column?

8 A. Counted comments, yes.

9 Q. And underneath that, there's -- there's just
10 yeses in that column, and it -- and it actually goes
11 onto the next page. Do you see that?

12 A. Yeah.

13 Q. Now, that would indicate that all of those
14 votes cast were counted. Would that be consistent --
15 Do you have any knowledge that those votes were not
16 counted?

17 A. No.

18 Q. And then all -- the next column over is
19 county where the votes were casted and --

20 A. Uh-huh.

21 Q. -- it appears that a -- the exhibit sticker
22 is over some -- some of those.

23 A. Spelled my name wrong too.

24 Q. But I -- if I represented to you that
25 underneath that exhibit that it appears that all of

1 A. Yes.

2 Q. -- in connection with this litigation?

3 A. Yes. I transcribed -- That's what I said
4 before. It was transcribed -- I transcribed that to
5 Excel so the data could be seen in its entirety. So I
6 took every -- every file that was in Access, used an
7 export procedure and -- to format it into the Excel
8 format which everyone else could read because they
9 didn't have a licensed copy of Access. Okay? It's
10 kind of a rare thing these days. Not many people use
11 it anymore.

12 Q. And when did you do that transcription to
13 Access?

14 A. I don't know. That was a while ago. I don't
15 remember exactly when it was. Couple of years ago, at
16 least.

17 Q. Okay. And I'll refer you to page 2 of
18 Exhibit 0003 where it talks in capital letter B about
19 your knowledge of GEMS databases. In that paragraph it
20 refers to a review you did of the structure and
21 operation of 2001 and 2002 GEMS databases from Hall
22 County and Cobb County. Do you see that reference on
23 page 2?

24 A. Yes. That, I don't remember.

25 Q. Okay. So you don't remember reviewing the

1 GEMS databases from Hall County and Cobb County in the
2 early 2000s; is that correct?

3 A. Best I can recall is that some of them didn't
4 work at all. I mean, the Access files were not
5 functional. But, again, it's the same thing as I said
6 before. It is GEMS data in an Access format.

7 Q. Okay. And I believe that you referred to a
8 transcription that you did of the GEMS database into
9 Access as part of this lawsuit; is that --

10 A. No, you got it wrong.

11 Q. I got it wrong. Okay. Go ahead. Correct me
12 and tell me -- tell me the work that you did.

13 A. As I received it, it is GEMS data -- all
14 right -- if you want to call it that. It's not a GEMS
15 database. GEMS data in the Access database. Okay?
16 Access is a database tool. Okay?

17 Q. Uh-huh.

18 A. And GEMS data -- GEMS, from what I
19 understand, will export data in the Access format so
20 that you can take -- take it up in Access and do
21 whatever you want to do with it. What I did was then
22 take that data that was already in Access with my
23 Access tool and exported it -- all the files, one by
24 one, to a tab in an Excel spreadsheet and then forward
25 that to Coalition team. So --

1 Q. Okay. Let me refer you back to the Exhibit
2 0003 where we were reading on the second page toward
3 the bottom, capital letter C. And at the very -- the
4 last line on that page, it talks about -- and, again,
5 it's your anticipated role to lead the team of less
6 experienced analysts in their labor intensive clerical
7 review of voluminous data. And that goes onto the
8 first line on the next page. Do you see what I'm
9 referring to there?

10 A. Yeah. That -- That never happened --

11 Q. Okay.

12 A. -- to my recollection.

13 Q. So other than the spreadsheets that you've
14 described, did you prepare any other kind of reports as
15 a result of the transcription work that you've
16 described?

17 A. No.

18 Q. In this lawsuit, Dr. Halderman has been
19 designated as an expert and has done some work as an
20 expert in this case. Have you had -- Have you ever
21 reviewed any reports prepared by Dr. Halderman in
22 connection with this lawsuit?

23 A. No.

24 Q. Have you ever spoken with Dr. Halderman or
25 any other experts concerning their findings with

1 respect to the Dominion system used in Georgia?

2 A. No.

3 Q. And one more question back on Exhibit 0003,
4 Mr. Digges. If you could scroll down to -- let me
5 see -- it's about the seventh page where it says
6 Exhibit A.

7 A. Ah, my resume.

8 Q. So that's your resume; correct?

9 A. Yeah, one of them.

10 Q. Okay. And if you'd just take a moment and
11 just look at your resume and make sure that it's an
12 accurate copy of your resume or one of your resumes.

13 A. Yeah. Yes, looks good.

14 Q. Okay. When you were working at Kennesaw
15 State University, did you do any work with respect to
16 the GEMS database or GEMS information?

17 A. No.

18 Q. I need to ask you about some of the elections
19 here in Georgia. Do you believe that the results of
20 the presidential election that was held here in Georgia
21 in November of 2020, do you believe that the results
22 from that election are valid?

23 A. Yes, I do.

24 Q. Do you believe that the results from -- of
25 any other election, other than the presidential

1 election in November of 2020, that those results are
2 valid?

3 A. Yes, I do.

4 Q. Do you have any evidence that any component
5 of the Georgia election system was actually hacked in
6 relation to the November 3, 2020, election?

7 A. No, I don't have any.

8 Q. Do you have any evidence that any malware was
9 actually inserted into any component of the Georgia
10 election system in connection with the election that
11 happened in November 2020?

12 A. No.

13 Q. And the same questions for the run-off that
14 happened in January. So do you believe that results of
15 the run-off here in Georgia -- run-off election in
16 January of this year, do you believe that the results
17 from that election are valid?

18 A. Yes.

19 Q. Do you believe that the -- Sorry. Strike
20 that.

21 Do you have any evidence that any component of
22 the Georgia election system was actually hacked in
23 connection with the run-off election that happened
24 earlier this year?

25 A. No.

1 Q. Do you have any evidence that there was any
2 malware inserted into any component of the Georgia
3 election system in connection with the run-off election
4 that happened earlier this year?

5 A. No.

6 Q. Do you have any evidence that any vote in the
7 presidential election in November 2020 was actually
8 switched from Donald Trump to Joseph Biden as a result
9 of an anomaly in the software?

10 A. No.

11 Q. Do you have any evidence that any vote in the
12 presidential election was actually switched from Donald
13 Trump to Joseph Biden as a result of an algorithm or
14 other design feature of the election system?

15 A. No.

16 Q. Do you have any evidence that any vote in any
17 election held in Georgia in November 2020 in the
18 general election were actually switched from any
19 candidate to another candidate as a result of an
20 anomaly in the software in the election system?

21 A. No, I do not.

22 Q. Do you have any evidence that any votes for
23 one candidate were switched to another candidate in the
24 November election that was the result of an algorithm
25 or other design feature in the Georgia election system?

1 A. No.

2 Q. Do you know of any evidence of widespread
3 voter fraud in Georgia in connection with the November
4 election held in 2020?

5 A. No.

6 Q. Do you have any evidence of any malfunction
7 of any component of the election system that impacted
8 the outcome of the presidential election in Georgia in
9 November 2020?

10 A. No.

11 Q. Do you have any evidence of any malfunction
12 of any component of the Georgia election system that
13 impacted the outcome of any of the other elections held
14 in November 2020?

15 A. There was a pollbook problem, wasn't there,
16 at some point? Hopefully, that was fixed.

17 Q. And what about the pollbook problem that you
18 know of?

19 A. They were assigning people to the wrong
20 precincts, so people were kind of having to run around.

21 Q. Did that pollbook problem affect your voting
22 in November --

23 A. No, it did not.

24 Q. Do you have any evidence that the Georgia
25 election system failed to count any legal votes in the

1 presidential election in November 2020?

2 A. No, I don't.

3 Q. Do you have any evidence that the Georgia
4 election system counted any illegal votes in the
5 presidential election in November 2020?

6 A. No.

7 Q. Do you have any evidence that there was a
8 mismatch between QR codes on paper ballots cast in the
9 presidential election in November 2020 and the human
10 readable portion of the paper ballots?

11 A. No.

12 Q. And that same question for the -- any other
13 elections that occurred in November 2020. Do you have
14 any evidence of any mismatch between QR codes on a
15 paper ballot and the human readable portion of the
16 paper ballot?

17 A. No.

18 Q. And explain for us how you personally have
19 been injured by the use of the old voting machines in
20 Georgia elections.

21 A. Well, it's forcing me to use the absentee
22 ballot for one. So I, you know, have to apply for it,
23 wait for it to get here, fill it out, make sure it gets
24 back. You know, we've had issues with how many stamps
25 are supposed to be on it.

1 And then the Post Office at the last election
2 was a little weird, so we had to actually drive to
3 the -- to the voting headquarters in Marietta there
4 and put it in the drop box. We ran into a lot of
5 traffic on the way, so it took us much longer than
6 usual.

7 What happens when you vote that way is that you
8 do miss out on a lot of the late-breaking information
9 that comes out. So there is also an impediment there
10 to making a good decision. And, you know, I enjoy
11 getting out and voting.

12 We've always voted together and -- you know,
13 with people. It's usually a happy time. And people
14 are at least focused, and, you know, everybody's
15 there with a common goal. So it's a -- it's a good
16 feeling. So I miss being able to do that with my
17 full trust.

18 Q. But for the years that you've cast a
19 ballot -- an absentee ballot here in Georgia, did you
20 have any trouble that prevented you from being able to
21 cast those ballots?

22 A. No, I was never not able. Is that what
23 you're saying?

24 Q. Yes, sir.

25 A. No.

1 Q. And the -- what you described as the
2 challenges of voting by absentee, is that in any way
3 different or unique to you or is it -- or is it in any
4 way different from any other voter?

5 A. I think a lot of that process would be the
6 same for many voters. If you don't have a car . . .

7 Q. And it is your personal preference that
8 Georgia would go to a hand-marked paper ballot system;
9 correct?

10 A. Yeah.

11 MS. LAROSS: Mr. Digges and Cary and other
12 counsel, I need to take a moment to -- to grab
13 copies of the declarations that Mr. Digges
14 referred to earlier. So if it's all right with
15 you, I'd like to take about a five-minute break
16 or a ten-minute break, whatever would work with
17 people -- for people.

18 THE WITNESS: Okay.

19 MR. ICHTER: Okay.

20 MS. LAROSS: Is that all right with you,
21 Mr. Digges, that we take a break?

22 THE WITNESS: Yes, I'm fine with that.

23 MS. LAROSS: Okay. So I'm showing that
24 it's now -- it's 11:28. Why don't we reconvene
25 at 11:40.

D I S C L O S U R E

I, Charlene M. Hansard, do hereby disclose pursuant to Article 10.B. of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia that I was contacted by the party taking the proceedings to provide court reporting services for this proceeding and there is no contract that is prohibited by O.C.G.A. Section 15-14-37(a) and (b) or Article 7.C. of the Rules and Regulations of the Board for the taking of this proceeding.

There is no contract to provide reporting services between myself or any person with whom I have a principal and agency relationship nor any attorney at law in this action, party to this action, party having a financial interest in this action, or agent for an attorney at law in this action, party to this action, or party having a financial interest in this action. Any and all financial arrangements beyond my usual and customary rates have been disclosed and offered to all parties.

DATED: September 23, 2021.



CHARLENE M. HANSARD, CCR-B-2341